REMARKS/ARGUMENTS

Favorable reconsideration of this application, as presently amended and in view of the following discussion, is respectfully requested.

Claims 1-8 are pending.

The present amendment amends Claims 1 and 6 and adds new Claims 7 and 8. Support for the amendment to Claim 1 is found in the specification at page 10, lines 19-23, and at page 12, lines 21-23, for example. The amendment to Claim 6 corrects a typographical error. Support for new Claims 7 and 8 is found in the originally filed claims. Thus, the changes to the claims are not believed to raise an issue of new matter.

Applicant first wishes to thank Examiners Chu and Eckert for the courtesies extended during the personal interview of April 14, 2005. During the interview the several outstanding grounds for rejection were discussed. It was proposed to amend Claim 1 to recite that the first fixing portion is formed of a first material including a metal and related arguments substantially as presented below were made. Additionally, it was proposed to amend Claim 1 to recite that the second fixing portion is formed of a second material different from the first material and to add new claims to state that the first and second fixing portions are contiguous; however, neither of these changes is made in the present amendment. No agreement was reached with respect to the ultimate patentability of the application, pending the examiners' further consideration and updated search of prior art.

Turning now to the outstanding Office Action, Claims 1 and 3 were rejected under 35 U.S.C. § 102(b) as anticipated by U.S. Patent No. 5,956,231 ("Yamada"), and Claims 1-4 were rejected under U.S.C. § 102(b) as anticipated by U.S. Patent No. 5,328,751 ("Komorita"). Additionally, Claims 5 and 6 were identified as containing allowable subject matter.

Applicant respectfully traverses the outstanding grounds for rejection because Claim 1, as presently amended, is neither anticipated by nor obvious over the applied references. As discussed during the interview, the Yamada reference discloses the use of silicone rubber in the gap between the insulator plate 33 and the metallic film 31 to prevent the occurrence of partial discharge. (Yamada at col. 15, lines 19-22 and 39-47.) Amended Claim 1 recites that "the first fixing portion [is] formed of a first material including a metal." Since Yamada uses silicone in the gap between the insulator plate 33 and the metallic film 31, Yamada is not believed to anticipate or make obvious the invention of Claim 1.

Therefore, applicant submits that independent Claim 1 patentably distinguishes over Yamada. Since Claims 2-6 depend from Claim 1, dependent Claims 2-6 are also believed to be allowable over Yamada for at least the same reasons as Claim 1.

Turning now to the Komorita reference, there is disclosed a brazing material layer 403 that bonds circuit portions 404 and 405 of the copper circuit plate 402 to the base board 401. (Komorita, col. 23, lines 9-14 and 44-50; col. 24, lines 5-7.) Regarding Claim 1, the Office Action states that a first fixing portion is disclosed as circuit portion 405, a second fixing portion is disclosed as circuit portion 404, and the total area of the first fixing portion (405) is much smaller than the second fixing portion (404). On this basis the outstanding Office Action concludes that the fixing strength circuit of portion 405 is smaller than the fixing strength of the portion 404.

However, Komorita describes at col. 25, line 66 to col. 26, line 6 (referring to Figure 25) that an ON/OFF switching operation was repeatedly effected for 10000 cycles, and thereafter, the respective bonded surface between the terminal connecting port 405 and the aluminum nitride base board 401 was observed, and no defects such as cracks were observed. In contrast, according to the present invention, there is formed a stress relaxing structure in which only the first fixing portion having a relatively weak fixing force is easily peeled off

upon receipt of an initial stress when using the product. Thus, breakage of the joint portion of the electrode terminal can be prevented. This advantage of the present invention cannot be expected in the Komorita reference.

Therefore, the Komorita reference fails to teach or suggest that the fixing strength of portion 405 is smaller than the fixing strength of portion 404. Thus, Komorita is not believed to anticipate or make obvious the invention of Claim 1. Therefore, applicant submits that independent Claim 1 patentably distinguishes over the Komorita reference.

Since Claims 2-6 depend from Claim 1, dependent Claims 2-6 are also believed to be allowable over Komorita for at least the same reasons as Claim 1.

Additionally, regarding Claim 2, the Office Action asserts that Komorita discloses the first fixing portion (405) being formed by providing a fixing member only on its peripheral portions while its central portion (406) is formed as an unfixed clearance portion. However, Figure 25 of Komorita, which shows a partial section of a module, does not disclose that the first fixing portion is formed to surround its peripheral portions. On the contrary, looking to the prior art configuration of Figure 27, the gap portion beneath the terminal connecting port 3 has only two connecting sides of the peripheral portion while the other two sides of the gap are configured as an opened structure. In the context of Komorita, it is natural that the gap (406) has a structure similar to that of Figure 27, having only two connecting sides of the peripheral portion, while the other two sides of the gap are configured as an opened structure. Since the peripheral portion of the gap is partially opened, Komorita does not achieve an advantage of the present invention, which is to prevent fluid substances used in the manufacturing processes from accumulating and later discharging.

Regarding Claims 3 and 4, the Office Action asserts that Komorita reference discloses a boundary portion between the first fixing portion (405) and the second fixing portion (404) being tightly sealed. However, it is apparent that the first fixing portion (405) and the second

fixing portion (404) are separated from each other in Fig. 25 of Komorita. In contrast, according to the present claimed invention, the opposing side of the first fixing portion (26) is in tight contact with that of the second fixing portion (24) to form a tightly sealed structure at the boundary therebetween.

Referring now to new Claims 7 and 8, Claims 7 and 8 include the allowable subject matter of Claims 5 and 6. Accordingly, Claims 7 and 8 are also believed to be allowable.

The amendments to the claims also eliminate the "semiconductor body" language that was objected to. Accordingly, the objection to the claims is believed to have become overcome.

In view of the foregoing discussion, no further issues are believed to be outstanding in the present application. Therefore, applicant respectfully request that the present application be allowed and be passed to issue.

Respectfully submitted,

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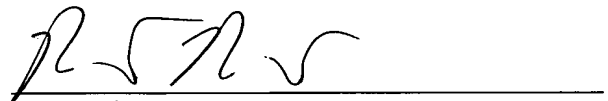

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